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Radio Affiliates of Professional Impressions Media Group, Inc.

5/17/94

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Secretary, Federal Communications Commission
1919 M Street NW
Washington, D.C. 29554

RE: EEO Notice of Inquiry

On behalf of WDWS-WHMS and DWS, Inc. I ask leave to make the following with regard to the solicitation of comments on EEO enforcement.

The recent release of the specific formula guidelines for enforcement could be helpful in and of itself, except for the retroactive nature of application. Many broadcasters have made good faith efforts to comply with the EEO programs that have been accepted as part of our license applications. The new quotas, and that seems to be exactly what they are, have not been a part of the EEO programs under which we've been operating.

We keep detailed records and separate files on each opening we advertise. We send blind follow-up forms to all applicants requesting ethnic, and gender information. The problem with this system, and one which I would welcome some suggestions toward resolution, is that while we can visually, in some cases, identify the ethnic and gender traits of applicants who are interviewed, we necessarily rely on voluntary return of our data forms from applicants who are not interviewed. It is not uncommon for us to receive the blind data forms back with such comments as "You can't ask this" or "None of your business." It is our understanding that we can ask this information on blind data forms. We also can not control the numbers of applicants who actually return the forms, nor can we verify that the responses are truthful. It would not stretch the imagination too far to expect that some returnees might lie on the data forms if they thought the forms were not really "blind" or they thought that identification as a particular minority might be helpful (or harmful) to their applications.

To establish such high fines based on information that the licensee can only control to a point does not seem to serve the interest of the stations, the applicants, or the commission for that matter. Inaccurate information harms everyone. It seems that the previous method of relying on actual hiring performance is more fair to all concerned and certainly more accurate.

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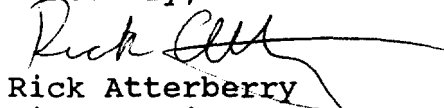
One final concern I wish to express is that experience has shown us that small to medium market radio stations are often at a severe disadvantage when recruiting minorities. I can't assume to speak for other operators, but others in the business have expressed circumstances similar to ours. We have a list of about 20 agencies to which we send notification of openings. We advertise in two local papers and have expanded our advertising into other Illinois communities with large minority populations. We have an open and welcoming interview process. In other words, I think we're doing a lot of things right, but we simply can not compete with the lure of television and large market stations for the pool of minority applicants.

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We are located in a college community. We have had internship programs with five junior colleges and universities and have participated in the Illinois Broadcasters Association minority internship program. All of these efforts notwithstanding we have seen minority after minority go into television or Chicago radio. We simply can not compete from a salary or ego gratification standpoint with television and larger market radio. We try diligently, but I believe some allowances need to be made for the intense competition for qualified minority applicants. In some ways, we are victimized by our own participation in these training programs. We help people get good at their craft, and then when the time comes to enter the workforce, they get better jobs than we can offer.

I appreciate this opportunity to express some of the difficulties faced by the best intentioned small and medium market radio operators and trust that the commission will carefully study the entire EEO program.

Sincerely,



Rick Atterberry
Vice-President
Radio Operations